

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:20-cr-112-1B0(3)

FILED IN OPEN COURT  
ON 3/5/2020 STS  
Peter A. Moore, Jr., Clerk  
US District Court  
Eastern District of NC

UNITED STATES OF AMERICA )

v. )

RUTH ELIZABETH BRAN )

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about July 18, 2016, in the Eastern District of North Carolina, the defendant, RUTH ELIZABETH BRAN, did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

COUNT TWO

On or about June 13, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, RUTH ELIZABETH BRAN, did knowingly attempt to procure her naturalization as a United States citizen contrary to law, by making a false statement under oath regarding her naturalization application, that is:

- a. On Part 12, Item 1 of defendant BRAN's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" she answered "No" when in fact as she then knew, she had claimed to be a United States citizen in a voter registration application on July 18, 2016.

- b. On Part 12, Item 2 of defendant BRAN's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" she answered "No" when in fact as she then knew, she had registered to vote on July 18, 2016.

All in violation of Title 18, United States Code, Section 1425(a).

### **COUNT THREE**

On or about June 13, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, RUTH ELIZABETH BRAN, did knowingly make under oath, and did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, defendant BRAN stated falsely in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on July 18, 2016.

All in violation of Title 18, United States Code, Section 1546(a).

### **COUNT FOUR**

On or about June 13, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, RUTH ELIZABETH BRAN, did knowingly make a false statement under oath in a case, proceeding, and matter relating to, and under, and

by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, defendant BRAN stated falsely under oath in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on July 18, 2016.

All in violation of Title 18, United States Code, Section 1015(a).

#### COUNT FIVE

On or about October 15, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, RUTH ELIZABETH BRAN, did knowingly attempt to procure her naturalization as a United States citizen contrary to law, by making a false statement under oath regarding her naturalization application, that is:

- a. On Part 12, Item 1 of defendant BRAN's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" she answered "No" when in fact as she then knew, she had claimed to be a United States citizen in a voter registration application on July 18, 2016.
- b. On Part 12, Item 2 of defendant BRAN's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" she answered "No" when in fact as she then knew, she had registered to vote on July 18, 2016.

All in violation of Title 18, United States Code, Section 1425(a).

### COUNT SIX

On or about October 15, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, RUTH ELIZABETH BRAN, did knowingly make under oath, and did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, defendant BRAN stated falsely in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on July 18, 2016.

All in violation of Title 18, United States Code, Section 1546(a).

### COUNT SEVEN

On or about October 15, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, RUTH ELIZABETH BRAN, did knowingly make a false statement under oath in a case, proceeding, and matter relating to, and under, and by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, defendant BRAN stated falsely under oath in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election

in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on July 18, 2016.

All in violation of Title 18, United States Code, Section 1015(a).

### COUNT EIGHT

On or about October 22, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, RUTH ELIZABETH BRAN, did knowingly procure her naturalization as a United States citizen contrary to law, by making a false statement under oath regarding her naturalization application, that is:

- a. On Part 12, Item 1 of defendant BRAN's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" she answered "No" when in fact as she then knew, she had claimed to be a United States citizen in a voter registration application on July 18, 2016.
- b. On Part 12, Item 2 of defendant BRAN's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" she answered "No" when in fact as she then knew, she had registered to vote on July 18, 2016.

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All in violation of Title 18, United States Code, Section 1425(a).

A TRUE BILL

**REDACTED VERSION**

Pursuant to the E-Government Act and the  
federal rules, the unredacted version of  
this document has been filed under seal. |

~~FOR~~PERSON

9-5-2020  
DATE

ROBERT J. HIGDON, JR.  
United States Attorney

Sebastian Kielmanovich  
BY: SEBASTIAN KIELMANOVICH  
Assistant United States Attorney